

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

**NORMAN TODD,**

Plaintiff,

vs.

CASE NUMBER 2:07-CV-149-MEF

**CITY OF CLANTON, ALABAMA**, a  
municipal corporation; by and through  
its **MAYOR, HONORABLE BILLY  
JOE DRIVER**, in his official capacity as  
Mayor and individually; **POLICE CHIEF  
JAMES HENDERSON**, in his official  
capacity, as well as individually;  
**CORPORAL GREG CHARLES**, in his  
official capacity and individually; and  
**CHRISTINE LITTLEJOHN**, an  
individual,

JURY TRIAL DEMANDED

Defendants.

**DEFENDANTS' INITIAL DISCLOSURES**

COME NOW the City of Clanton, Alabama, a municipal organization,  
Mayor Billy Joe Driver, Chief James Henderson, and Corporal Greg Charles, to  
file their Initial Disclosures and state as follows:

**1. Witnesses**

The Defendants anticipates that the following persons listed below are likely  
to have discoverable information that Defendants may use to support their

defenses, unless solely for rebuttal or impeachment:

- A. Honorable Billy Joe Driver, Mayor  
City of Clanton  
505 2<sup>nd</sup> Avenue North  
Clanton, Alabama 35045  
205-755-1105

Subjects: The City's position as it pertains to the instant case.

- B. Ms. Debbie Orange, City Clerk  
City of Clanton  
505 2<sup>nd</sup> Avenue North  
Clanton, AL 35045  
205-755-4051

Subjects: Any and all documents filed with the City pertaining to the instant case.

- C. Clanton Police Chief James Henderson  
City of Clanton Police Department  
601 First Avenue  
Clanton, AL 35045  
205-755-1194

Subjects: The events and occurrences pertaining to Ms. Littlejohn's access to Mr. Todd's trailer and the events and occurrences pertaining to Mr. Todd's alleged Unauthorized Use of a Motor Vehicle

- D. Corporal Greg Charles (formerly with the City of Clanton Police)  
City of Clanton Police Department  
601 First Avenue  
Clanton, AL 35045  
205-755-1194

Subjects: The events and occurrences pertaining to Ms. Littlejohn's

access to Mr. Todd's trailer.

- E. Ms. Christy Littlejohn  
133 Randall Circle  
Clanton, AL 35045  
205-755-8842

Subjects: The events and occurrences pertaining to Ms. Littlejohn's access to Mr. Todd's trailer and the events and occurrences pertaining to Mr. Todd's alleged Unauthorized Use of a Motor Vehicle.

- F. Ms. Debra Allison  
1800 Ashley Court Trailer Park  
Clanton, AL 35045  
205-755-8574

Subjects: The events and occurrences pertaining to Ms. Littlejohn's access to Mr. Todd's trailer.

- G. Any witnesses listed by Plaintiff through initial disclosures or by supplement.

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**2. Documents**

Categories of non-privileged documents that Defendants have that are likely to have discoverable information that Defendants may use to support their defenses, unless solely for rebuttal or impeachment are:

- A. Warrant of Arrest issued against Norman Todd for Unauthorized Use of a Motor Vehicle;
- B. Police Report pertaining to Norman Todd for alleged Unauthorized Use of a Motor Vehicle;
- C. Complaint filed by Christy Littlejohn against Normal Todd and

supporting documents (Alabama Liability Insurance Identification Card, Alabama Department of Revenue Application for Certificate of Title, McKinnon Motors, LLC Invoice, World Omni Financial Corp. Agreement to Provide Accidental Physical Damage Insurance, World Omni Financial Corp. Installment Sale Contract, McKinnon Motors, LLC Vehicle Description, and McKinnon Motors, LLC Yield Spread/Assignment Fee);

- D. Voluntary Statement of Christine Littlejohn as it relates to Norman Todd's alleged Unauthorized Use of a Motor Vehicle;
- E. Appearance Bond of Norman Todd;
- F. Case Action Summary pertaining to Norman Todd's alleged Unauthorized Use of a Motor Vehicle;
- G. Affidavit of Debra Allison;
- H. Affidavit of Police Chief James Henderson;
- I. Any documents listed by Plaintiff through initial disclosures or by supplement.

### **3. Insurance Information**

Defendants submit that they have a policy of insurance that will be made available to the Plaintiff for inspection and copying.

/s/ James W. Porter II

James W. Porter II, one of the  
Attorneys for Defendants, City of Clanton,  
Mayor Billy Joe Driver, James Henderson,  
and Greg Charles  
State Bar ID ASB 3314 T79J

State Code POR001

/s/ Christy Lynn Sherbrook

Christy Lynn Sherbrook, one of the  
Attorneys for Defendants, City of Clanton,  
Mayor Billy Joe Driver, James Henderson,  
and Greg Charles  
State Bar ID ASB 2409 H65S  
State Code SHE 094

OF COUNSEL:

PORTER, PORTER & HASSINGER, P.C.  
P.O. Box 128  
Birmingham, Alabama 35201-0128  
(205) 322-1744  
Fax: (205) 322-1750

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been ***electronically filed*** with the Clerk of the Court using the CM/ECF system which will send notification of such filing upon the following, this, the 22<sup>nd</sup> day of **April**, 2008. If Notice of Electronic Filing indicates that Notice should be delivered by other means to any of the following, I certify that a copy will be sent via U.S. Mail, properly addressed, postage prepaid.

Donald G. Madison, Esq.  
418 Scott Street  
Montgomery, AL 36104

/s/ James W. Porter II

OF COUNSEL